

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability Litigation	MDL NO. 2:15-md-02641-PHX-DGC
This document relates to the cases listed on the Exhibit attached hereto.	STIPULATION OF DISMISSAL WITHOUT PREJUDICE

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Plaintiffs whose cases are listed on Exhibit A attached hereto (“Plaintiffs”) and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Defendants”), and file this Stipulation of Dismissal without Prejudice, and in support thereof, respectfully show the Court as follows:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Defendants hereby stipulate to the dismissal of the cases listed on Exhibit A without prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request that the Court dismiss the cases listed on Exhibit A in their entirety without prejudice to the re-filing of same and order that these parties are to bear their own costs.

Respectfully Submitted,

s/ Debra J. Humphrey

Debra J Humphrey
Marc J Bern & Associates LLP
60 E 42nd St., Ste. 950
New York, NY 10165
212-702-5000
212-818-0164 (fax)
dhumphrey@bernllp.com

ATTORNEY FOR PLAINTIFFS

s/ Richard B. North, Jr.

Richard B. North, Jr.
richard.north@nelsonmullins.com
NELSON MULLINS RILEY &
SCARBOROUGH LLP
201 17th St. NW, Ste. 1700
Atlanta, GA 30363
P: 404.322.6000
F: 404.332.6397

ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

s/ Debra J. Humphrey

Debra J Humphrey

EXHIBIT "A"

Member Case Number	Full Name of Plaintiff	Date Answer Filed (If applicable)
2:18-cv-00760-DGC	Robert Diliberto	
2:17-cv-04311-DGC	Delores Dobson	
2:17-cv-04272-DGC	Kitty Dorn	
2:17-cv-01105-DGC	Anne Dornberger	
2:17-cv-03333-DGC	Veronda Dunlap	
2:18-cv-01784-DGC	John Lee Dunson	
2:17-cv-03790-DGC	Lisa Durkee	
2:17-cv-03804-DGC	Kimber Edmondson	
2:19-cv-00715-DGC	Ada Eidson	
2:17-cv-04330-DGC	Donald Ellis	
2:17-cv-04043-DGC	Vicky Fail	
2:17-cv-03885-DGC	Patty Fairchild	
2:19-cv-03975-DGC	Justin Falls	
2:17-cv-03620-DGC	William Farlow	
2:19-cv-03991-DGC	Paula Felger	
2:17-cv-03371-DGC	Danielle Fenderson	
2:19-cv-00320-DGC	John Ferree	